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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 vs.  
22 UBER TECHNOLOGIES, INC.;  
23 OTTOMOTTO LLC; OTTO TRUCKING  
24 LLC,  
25 Defendants.

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CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S OPPOSITION TO DEFENDANT  
UBER'S MOTION IN LIMINE 23**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached as Exhibit A is a true and correct copy of transcript excerpts from the  
7 Videotaped Deposition of Cameron Poetscher, taken on June 19, 2017 and filed under seal.

8 3. Attached as Exhibit B is a true and correct copy of email exchanges between  
9 counsel for the parties between from May 20, 2017 through May 24, 2017 regarding discovery  
10 issues.

11 4. Attached as Exhibit C is a true and correct copy of UBER00006471-  
12 UBER00006480.

13 5. Attached as Exhibit D is a true and correct copy of UBER00017083-  
14 UBER00017091.

15 6. Attached as Exhibit E is a true and correct copy of a June 25, 2017 email from  
16 Waymo's counsel to Uber's counsel.

17 7. Attached as Exhibit F is a true and correct copy of transcript excerpts from the  
18 FRCP 30(b)(6) deposition of Eric Meyhofer, taken August 18, 2017 and filed under seal.

19 8. Attached as Exhibit G is a true and correct copy of transcript excerpts from the  
20 deposition of Jeff Holden, taken August 15, 2017 and filed under seal.

21 9. Attached as Exhibit H is a true and correct copy of transcript excerpts from the  
22 deposition of Daniel Gruver, taken August 4, 2017 and filed under seal.

23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct.

25 DATED: September 13, 2017

26 */s Jeff Nardinelli*  
Jeff Nardinelli

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1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Jeff Nardinelli.

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5                   */s/ Charles K. Verhoeven*  
6                   Charles K. Verhoeven  
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